

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

GERRY E. BINGAMAN, et al.,	:	Case No. 1:01CV707
Plaintiffs,	:	Judge Herman J. Weber
v.	:	
THE PROCTER & GAMBLE COMPANY,	:	<u>MEMORANDUM IN SUPPORT OF DEFENDANT THE PROCTER & GAMBLE COMPANY'S BILL OF COSTS</u>
Defendant.	:	
	:	

The following is an itemization of costs listed on Defendant The Procter & Gamble Company's Bill of Costs. Supporting Documentation is attached hereto as Exhibit A.

A. Court Reporter Fees For Deposition Transcripts Necessarily Obtained For Defendant's Motion For Summary Judgment

1.	Deposition of Plaintiff Gerry Bingaman:	\$1,705.05
2.	Deposition of Plaintiff Annie Brantley	\$1,284.45
3.	Deposition of Barbara Lancor	\$336.00
4.	Deposition of Debora Whittenbarger	\$381.00
5.	Deposition of Barry Lane Baker	\$112.00
6.	Deposition of James Boniface Rapp	\$95.00
7.	Deposition of Michael Lindsey	\$405.00
8.	Deposition of Scott Davis	\$373.23
9.	Deposition of Graham J. Carter	\$286.75
10.	Deposition of Trian J. Biegger	\$491.10
SUBTOTAL		\$5,469.58

B. Duplication Costs (Fees For Printing)

1. Answer for First Amended Complaint:

8 pages X \$0.10/page X 4 copies¹ \$3.20

2. Discovery Produced To Plaintiff:

2,291 pages X \$0.10/page X 1 copy \$229.10

3. Discovery Produced By Plaintiff:

2,883 pages X \$0.18/page X 1 copy + \$31.14 sales tax \$550.08

3,112 pages X .13/page X 1 copy + \$24.27 sales tax \$428.83

3. Motion For Summary Judgment and Memorandum In Support

50 pages X \$0.10/page X 4 copies \$20.00

4. Proposed Findings of Fact and Conclusions of Law

30 pages X \$0.10/page X 4 copies \$12.00

5. Reply Memorandum In Support Of Motion For Summary Judgment

34 pages X \$0.10/page X 4 pages \$13.60

SUBTOTAL \$1,256.81

¹ Includes one Court copy, one opposing counsel copy, one client copy, and one attorney work copy.

Respectfully submitted,

/s/ Michael S. Glassman

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Attorney for Defendant
The Procter & Gamble Company

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2005 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to George M. Reul, Esq., and Randolph H. Feking, Esq., Freking & Betz, 215 East Ninth Street, Fifth Floor, Cincinnati, Ohio 45202, attorneys for Plaintiffs Gerry E. Bingaman & Annie Brantley.

/s/ Michael S. Glassman

Michael S. Glassman (0012713)

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